

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:

TPC GROUP INC. *et al.*,<sup>1</sup>

Debtors.

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§ Chapter 11

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§ Case No. 22-10493 (CTG)

§

§ Jointly Administered

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Hearing Date: June 2, 2022 9:15 a.m. (Eastern time)

**AD HOC GROUP OF NON-CONSENTING NOTEHOLDERS' WITNESS AND  
EXHIBIT LIST FOR FIRST DAY HEARING**

Bayside Capital, Inc. ("Bayside") and Cerberus Capital Management, L.P. ("Cerberus," and together with Bayside, the "Ad Hoc Group of Non-Consenting Noteholders") submits this witness and exhibit list for the first day hearing scheduled for **June 2, 2022 at 9:15 a.m. (ET)** (the "Hearing") before the Honorable Craig T. Goldblatt, at the United States Bankruptcy Court for the District of Delaware, located at 824 N. Market Street, 3rd Floor, Courtroom No. 7, Wilmington, Delaware 19801.

**WITNESSES**

The Ad Hoc Group of Non-Consenting Noteholders designates the following persons as witnesses who may be called at the hearing.

(1) **Alexander Tracy** of Perella Weinberg Partners concerning *Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to Prepetition Secured Parties; (IV) Modifying the Automatic Stay; and (V) Granting Related Relief* [Docket No. 36] and alternative DIP proposals made by Bayside and Cerberus.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: TPC Group Inc. (3618); TPC Holdings, Inc. (7380); TPC Group LLC (8313); Texas Butylene Chemical Corporation (7440); Texas Olefins Domestic International Sales Corporation (4241); TPC Phoenix Fuels LLC (9133); Port Neches Fuels, LLC (1641); and TP Capital Corp. (6248). Each Debtor's corporate headquarters and mailing address is 500 Dallas St., Suite 2000, Houston, Texas 77002.

The Ad Hoc Group of Non-Consenting Noteholders also cross designates all witnesses designated by any other party in connection with the Hearing, and reserves the right to call any necessary rebuttal or impeachment witnesses.

**EXHIBITS**

The Ad Hoc Group of Non-Consenting Noteholders designates the following exhibits that may be used at the Hearing:

<b>Exhibit No.</b>	<b>Document Description</b>
<b>1</b>	Alternative DIP proposal made by Bayside and Cerberus

The Ad Hoc Group of Non-Consenting Noteholders also cross designates all exhibits designated by any other party in connection with the Hearing, and reserves the use additional exhibits for rebuttal or impeachment purposes.

The Ad Hoc Group of Non-Consenting Noteholders reserves the right to amend or supplement this witness and exhibit list prior to the Hearing.

Dated: June 2, 2022  
Wilmington, Delaware

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Timothy P. Cairns

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